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Attorneys for Individual and Representative Plaintiffs
 eMag Solutions LLC, eMag Solutions Limited, Greencorp
 Magnetics Pty, Ltd., and Delta Magnetics, S.A. de C.V.,
 and Individual Plaintiff Cintas VAC, S.A. de C.V.

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

eMAG SOLUTIONS LLC, eMAG SOLUTIONS
 LIMITED, GREENCORP MAGNETICS PTY
 LTD., and DELTA MAGNETICS, S.A. de C.V.,
 on behalf of themselves and all others similarly
 situated,

Plaintiffs,

v.

TODA KOGYO CORPORATION, et al.,

Defendants.

CINTAS VAC, S.A. de C.V.

Plaintiff,

v.

TODA KOGYO CORPORATION, et al.,

Defendants.

No. C-02-1611 PJH

**STIPULATION AND ~~PROPOSED~~
 ORDER PURSUANT TO FED. R. CIV. P.
 15(a) TO FILE FOURTH AMENDED
 CONSOLIDATED CLASS ACTION
 COMPLAINT**

WHEREAS, Quantegy Recording Solutions, LLC (f/k/a Quantegy, Inc.; f/k/a Ampex
 Recording Media Corporation) ("Quantegy") seeks to be a named-plaintiff in the above-
 captioned litigation;

1 WHEREAS, Quantegy asserts identical claims based on substantially identical
2 factual allegations as the existing named plaintiffs; and

3 WHEREAS, the amendment of the complaint does not raise any new issues
4 different from those addressed in the Court's prior ruling, dated July 20, 2005, granting in part
5 Defendants' motion to dismiss the complaint;

6 WHEREAS, the proposed Fourth Amended Consolidated Class Action Complaint
7 differs from the operative Third Amended Consolidated Class Action Complaint only in the
8 following respects, as reflected in a redline comparison, attached hereto as Exhibit A:

- 9 · Quantegy is added as a plaintiff to paragraphs 1, 57, 64, and 68;
- 10 · Quantegy's relevant factual allegations are added in paragraphs 12 through 16.

11 WHEREAS, beginning in February 2007, Plaintiffs' Counsel sought to obtain the
12 agreement of Defendants Toda Kogyo Corporation, Toda America Inc. (collectively "Toda"), and
13 Titan Kogyo Kabushiki Kaisha ("Titan") to agree to the amendment and filing of the Fourth
14 Amended Complaint.

15 WHEREAS, on March 22, 2007, Defendants Toda Kogyo Corporation and Toda
16 America Inc. agreed to the amendment and filing of the Fourth Amended Complaint. A copy of
17 the Stipulation between Plaintiffs and Toda is attached hereto as Exhibit B;

18 WHEREAS, Plaintiffs Counsel did not seek the consent of Defendants Sakai
19 Chemical Industry Co., Ltd.; Sakai Trading Co., Ltd.; Sakai Trading New York, Inc.; Ishihara
20 Sangyo Kaisha, Ltd.; ISK Americas Incorporated; ISK Magnetics, Inc.; and Ishihara Corporation
21 (USA) because this action has been settled with respect to each of these Defendants.

22 WHEREAS, on April 3, 2007, Plaintiffs filed a Motion for Order Granting Leave
23 to File Fourth Amended Consolidated Class Complaint.

24 Plaintiffs and Defendant Titan Kogyo Kabushiki Kaisha ("Titan"), by and through their
25 counsel of record, stipulate and agree as follows:

26 1. To effectuate the addition of Quantegy as a named plaintiff while saving judicial
27 resources, Titan agrees that Plaintiffs may file the Fourth Amended Consolidated Class Action
28 Complaint, a copy of which is attached hereto as Exhibit C;

2. The First Amended Complaint is deemed filed and served as of the date of this Order;

3. Titan shall have 45 days from the Court's order granting Plaintiffs leave to amend the complaint to respond to the new allegations in the Fourth Amended Complaint;

4. Titan waives notice and service of the Fourth Amended Complaint and shall not be required to answer the amendment, and that the motion to dismiss for lack of personal jurisdiction filed by Titan to the Third Amended Complaint shall be responsive to the Fourth Amended Complaint;

5. By agreeing to this Stipulation, Titan does not waive its contention that Titan is not subject to personal jurisdiction in this Court.

6. Other than as set forth in paragraph 3, this Stipulation will not affect any dates currently scheduled in this action.

The parties hereby stipulate, and request that the Court so order.

Dated: April 18, 2007

Respectfully submitted,

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By: /s/
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Dated: April 18, 2007	<p>William M. Goodman (State Bar No. 61305) Tania M. Mortensen (State Bar No. 209065) KASOWITZ, BENSON, TORRES & FRIEDMAN LLP (formerly TOPEL & GOODMAN) 832 Sansome Street, 4th Floor San Francisco, CA 94111 Telephone: (415) 421-6140</p> <p>By: _____/s/ Willaim M. Goodman</p> <p>Attorneys Appearing Specially for Defendant Titan Kogyo Kabushiki Kaisha</p>

[PROPOSED] ORDER

Pursuant to Stipulation, it is so ORDERED

DATED: 4/20/07 _____



ATTESTATION

I hereby attest that I have on file all holograph signatures for any signatures indicated by a "conformed" signature (/S/) within this e-filed document.

DATED: April 18, 2007

By: /s/
Daniel M. Hutchinson

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